

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS
ANTITRUST LITIGATION

This Document Relates to All Cases

MDL No. 2817
Case No. 18 C 864

Hon. Robert M. Dow, Jr.
Magistrate Judge Jeffrey T. Gilbert

**MDL PLAINTIFFS' MOTION CHALLENGING CDK GLOBAL, LLC'S
MARCH 8, 2019 CLAWBACKS AND TO COMPEL PRODUCTION OF
INADEQUATELY LOGGED DOCUMENTS FROM CDK GLOBAL, LLC'S
FTC PRIVILEGE LOG**

MDL Plaintiffs respectfully move this Court to compel CDK Global, LLC ("CDK") to produce the unprivileged documents from CDK's Clawback Documents and the FTC Privilege Log. In support of this motion, MDL Plaintiffs incorporate by reference the memorandum of law and exhibits filed concurrently herewith and any oral argument that the Court may allow at a hearing on this Motion.

Pursuant to Local Rule 37.2, MDL Plaintiffs certify that they have met and conferred with counsel for Defendant CDK in a good faith attempt to resolve the disputes presented by this Motion.

Dated: April 17, 2019

Respectfully submitted,

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth

MILBERG TADLER PHILLIPS

GROSSMAN LLP

One Pennsylvania Plaza, 19th Floor
New York, NY 10119

(212) 594-5300

pwedgworth@milberg.com

/s/ Derek T. Ho

Derek T. Ho

KELLOGG, HANSEN, TODD,

FIGEL & FREDERICK, P.L.L.C.

1615 M Street, NW, Suite 400

Washington, D.C. 20036

(202) 326-7900

dho@kellogghansen.com

MDL Co-Lead Counsel

CERTIFICATE OF SERVICE

I, Derek T. Ho, an attorney, hereby certify that on April 17, 2019 I caused a true and correct copy of the foregoing **MDL PLAINTIFFS' MOTION CHALLENGING CDK GLOBAL, LLC'S MARCH 8, 2019 CLAWBACKS AND TO COMPEL PRODUCTION OF INADEQUATELY LOGGED DOCUMENTS FROM CDK GLOBAL, LLC'S FTC PRIVILEGE LOG** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by email to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF system.

/s/ Derek T. Ho

Derek T. Ho
**KELLOGG, HANSEN, TODD,
FIGEL & FREDERICK, P.L.L.C.**
1615 M Street, NW, Suite 400
Washington, D.C. 20036
(202) 326-7900
dho@kellogghansen.com